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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-mj-00304-VCF

Plaintiff,

V.

Stipulation for an Order Directing Probation to Prepare a Criminal History Report

JUAN BARAHONA-ORTEGA,
aka "Jose Luis Barahona,"
aka "Juan Ortega,"
aka "Jose Ortega,"
aka "Julio Edgardo Barahona,"
aka "Tulio Ordonez,"
aka "Julio Edgardo Ordonez."

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Aden Kebede, Assistant Federal Public Defender, counsel for Defendant JUAN BARAHONA-ORTEGA, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

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1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 4th day of May, 2022.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Aden Kebede
ADEN KEBEDE
Assistant Federal Public Defender
Counsel for Defendant JUAN
BARAHONA-ORTEGA

/s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-mj-00304-VCF

Plaintiff,

Order Directing Probation to Prepare a Criminal History Report [Proposed]

JUAN BARAHONA-ORTEGA,

aka "Jose Luis Barahona,"
aka "Juan Ortega,
aka "Jose Ortega,"
aka "Julio Edgardo Barahona,"
aka "Tulio Ordóñez,"
aka "Julio Edgardo Ordóñez,"

Defendant.

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 4th day of May, 2022.

Carl Gaddis

HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE